

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF OKLAHOMA**

DOUGLAS MASTRIANO

*PLAINTIFF,*

v.

JAMES GREGORY, III, *et al.*,

*DEFENDANTS.*

Case No.: 5:24-cv-00567-F

Assigned to the Hon. Bernard M. Jones

**STIPULATION TO DEADLINE TO  
RESPOND TO PLAINTIFF'S  
AMENDED COMPLAINT**

Plaintiff, Douglas Mastriano, and Defendants James Gregory, Roland Kuhn, University of New Brunswick, Paul Mazerolle, David MaGee, Drew Rendall, Jeff Brown, Cindy Brown, Stephen Dutcher, Sean Kennedy, Erin Morton, Matthew Sears, Lee Windsor, Stefanie Hunt-Kennedy, Carolyn MacDonald, Sasha Mullaly, Lisa Todd, Sarah-Jane Corke, Bonnie Huskins, the Estate of Elizabeth Mancke, Angela Tozer, Margaret MacMillan, Robert Bothwell, John Ferris, and Janet Mullin (collectively, the "Parties"), through their respective undersigned counsel of record, hereby file this stipulation as it relates to the deadline for all named Defendants to file an answer or otherwise respond to Plaintiff's Amended Complaint.

On February 4, 2025, the Court ordered that Plaintiff was to file proofs of service related to his Amended Complaint no later than 45 days from the date of entry of the order. (Doc. No. 132). Concurrently, the Court also ordered that no answer or other response to the Amended Complaint would be required by any Defendant until 21 days after the aforementioned 45-day deadline. (*Id.*). Judge Stephen P. Friot issued this Order with a clear intent to avoid confusion by keeping all Defendants on the same briefing scheduling. (*Id.*).

On March 6, 2025, this Court extended the time for Plaintiff to serve his Amended Complaint and file proofs of service to September 5, 2025. (Doc No. 138).

Accordingly, in an effort to solidify the deadline, the Parties now stipulate that:

- (a) no Defendant in this matter will be required to answer, move, or otherwise respond to Plaintiff's Amended Complaint until 21 days after Plaintiff files his proofs of service for all individual Canadian defendants;
- (b) with his final proof of service (*i.e.*, for the last individual Canadian Defendant served), Plaintiff shall separately file a Notice of Service on Individual Canadian Defendants indicating that proofs of service for all individual Canadian Defendants have been filed;
- (c) the 21-day period for Defendants to respond shall begin upon the filing of Plaintiff's Notice of Service on Individual Canadian Defendants; and
- (d) in the event that all individual Canadian Defendants are not served by the September 5, 2025 deadline set forth in this Court's previous Order (Doc No. 138), the Parties will have 21 days or until September 26 2025 to answer, move, or otherwise respond to Plaintiff's Amended Complaint.

The Parties believe this deadline is appropriate due to the varying dates of service of the Amended Complaint on each of the named Defendants, and when considering Judge Stephen P. Friot's clear intent to keep all the Defendants on the same briefing scheduling. (Doc. No. 132).

Therefore, the Parties seek an Order of the Court affirming that the deadline for all Defendants to answer, move, or otherwise respond to Plaintiff's Amended Complaint is 21 days after Plaintiff files his proofs of service for all individual Canadian defendants or September 26, 2025, whichever occurs first.

Respectfully submitted on this 28th day of March, 2025.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed electronically on this 28th day of March, 2025, which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

*/s/ Michael Passman*  
Michael Passman  
*Admitted Pro Hac Vice*